## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
FRANCHISE GROUP, INC., et al.,1	)	Case No. 24-12480 (LSS)
Reorganized Debtors.	)	(Jointly Administered)
	)	Objection Deadline: August 12, 2025 at 4:00 p.m. (ET)
	) ) )	Hearing Date: August 19, 2025 at 10:00 a.m. (ET)

## **NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that Franchise Group, Inc. and Freedom VCM Holdings, LLC (together, the "Reorganized Debtors")<sup>2</sup> have filed the Reorganized Debtors' Motion for Order Extending the Administrative Claims Objection Deadline Under Confirmed Chapter 11 Plans (the "Motion")<sup>3</sup> with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before <u>August 12, 2025, at 4:00 p.m. (prevailing Eastern Time)</u> (the "<u>Objection Deadline</u>") with the Court, 3<sup>rd</sup> Floor, 824 North Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon the undersigned counsel to the Reorganized Debtors so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION IS SCHEDULED TO BE HELD ON AUGUST 19, 2025, AT 10:00 A.M.

The last four digits of Franchise Group, Inc.'s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. For purposes of the Motion, the terms "Reorganized Debtors" or "Debtors", as applicable, also include certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors' claims and noticing agent, at <a href="https://cases.ra.kroll.com/FRG/">https://cases.ra.kroll.com/FRG/</a>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors' cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

On July 28, 2025, Freedom VCM Holdings, LLC filed a motion seeking authority to close its chapter 11 case [Docket No. 1767].

<sup>&</sup>lt;sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

(PREVAILING EASTERN TIME) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN IN THE COURT, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: July 29, 2025 Wilmington, Delaware

/s/ Allison S. Mielke

## YOUNG CONAWAY STARGATT & TAYLOR, LLP

Edmon L. Morton (Del. No. 3856) Matthew B. Lunn (Del. No. 4119) Allison S. Mielke (Del. No. 5934) Shella Borovinskaya (Del. No. 6758)

Rodney Square

1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: emorton@ycst.com
mlunn@ycst.com

amielke@ycst.com sborovinskaya@ycst.com

## KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*) Nicole L. Greenblatt, P.C. (admitted *pro hac vice*)

Derek I. Hunter (admitted pro hac vice)

601 Lexington Avenue

New York, New York 10022 Telephone: (212) 446-4800 Facsimile: (212) 446-4900

Email: joshua.sussberg@kirkland.com

nicole.greenblatt@kirkland.com derek.hunter@kirkland.com

- and -

Mark McKane, P.C. (admitted pro hac vice)

555 California Street

San Francisco, California 94104 Telephone: (415) 439-1400 Facsimile: (415) 439-1500

Email: mark.mckane@kirkland.com

Co-Counsel to the Reorganized Debtors

Co-Counsel to the Reorganized Debtors